

EXHIBIT A

Proposed Form of Order

(Attached)

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

FCS ADVISORS, LLC,

Plaintiff,

—against—

THEIA GROUP, INC., d/b/a “THORIAN
GROUP” and/or “CYPHERIAN”; THEIA
AVIATION, LLC; and THEIA HOLDINGS
A, INC., d/b/a “THORIAN HOLDINGS,”

Defendants.

21 Civ. 6995 (PKC)

**[PROPOSED] ORDER GRANTING EXPEDITED MOTION
OF RECEIVER FOR AN ORDER FURTHER EXTENDING
THE STAY PROVIDED IN THE RECEIVERSHIP ORDER**

Upon consideration of the *Expedited Motion of Receiver for an Order Further Extending the Stay Provided in the Receivership Order* (the “Motion”) and the accompanying *Memorandum of Law in Support of the Motion* (the “Memorandum”),¹ and the Court finding that good cause exists for the relief requested in the Motion,

IT IS HEREBY ORDERED THAT:

1. The Motion is **GRANTED**;
2. The Receivership Stay provided for in paragraph 4 of the Receivership Order is further extended through and including October 15, 2022, without prejudice to (a) the Receiver’s right to seek further extensions of the Receivership Stay or (b) the right of any party or non-party under paragraph 4 of the Receivership Order to seek relief from the Receivership Stay; and

¹ Capitalized terms not defined in this Order shall have the meaning given such terms in the Memorandum.

3. The Court retains jurisdiction with respect to all matters arising from or related to the implementation, interpretation, and enforcement of this Order.

Dated: July _____, 2022
New York, New York

P. KEVIN CASTEL
UNITED STATES DISTRICT JUDGE